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via e-mail to [kristina.rudzki@ontario.ca](mailto:kristina.rudzki@ontario.ca)

Dear sirs

**EBR Registry Number: 011-5239**  
**Gilead Power Corporation Approval for a Renewable Energy Project**  
**Ostrander Point Prince Edward County**

This letter is a formal objection to the instrument proposal referenced above.

Based on a review of the existing information on the proposed Ostrander Point Industrial Wind Energy Park, the required approval under O Reg 359/09 should not be granted to the Project in its present form.

Detailed comments are set out in the attached Information Note titled "Proposed Ostrander Point Industrial Wind Energy Park Review of the Existing Information" dated 17 February 2012.

To summarise those comments:

1. Ostrander Point is located in an Internationally Significant Important Bird Area and is host to several hundred species of birds, including raptors, migratory waterfowl and passerines and species at risk. It is within a Candidate Area of Natural and Scientific Interest and if the ANSI designation were confirmed this development would be prohibited.
2. Independent review of the Stantec Environmental Impact Study Report submitted by Gilead Power has indicated a number of technical issues with the report which call its conclusions and recommendations into question. In particular there are troubling questions as regards the methodologies used in surveying important avian and amphibian species and as a result the report conclusions and recommendations are considered unreliable.
3. An independent appraisal of Federal Environment Canada site selection criteria for Wind Turbines considered together with recent siting guidelines for Great Lakes wind energy put forward by the Nature Conservancy indicates that the site should be considered not suitable for wind turbine development due to the potential impact on avian species.

4. Both Federal and Provincial Authorities have expressed concerns with regard to draft versions of the Stantec EIS Report. Although there have been no significant changes to the findings and recommendations of the report since those reservations were expressed, it appears that provincial authorities have agreed that the report and the proposed approval of the project under O Reg 359/09 is now suitable for public consultation . There is no evidence as to whether Federal Authorities now agree that their concerns have been addressed.
5. Under Federal EA Requirements the Public Concerns expressed to date would require that the Project be taken to review or mediation.
6. In addition, Federal EA procedures include a requirement for a cumulative impact assessment which is particularly relevant in view of the large numbers of other IWT projects proposed for the area. The proponent has undertaken a limited cumulative assessment, however the results and conclusions leave a large number of questions unanswered as regards the impacts of this project and the other proposed IWT projects in the area.
7. In view of the information above considered together with recent calls by the Senate of Canada for a moratorium on IWT development in Eastern Lake Ontario, this project should not proceed in its present form.

Please refer to the attached information note for a full discussion of the issues summarized above.

Yours faithfully



B.I. Dubin

Encl: Information Note titled "Proposed Ostrander Point Industrial Wind Energy Park Review of the Existing Information" dated 17 February 2012.

CC: The Honourable Jim Bradley, Minister of the Environment via Email:  
[minister.moe@ontario.ca](mailto:minister.moe@ontario.ca)